

ORIGINAL

IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF TEXAS  
FORT WORTH DIVISION

U.S. DISTRICT COURT  
NORTHERN DISTRICT OF TEXAS  
FILED

UNITED STATES OF AMERICA

v.

MARY JANE MCINTYRE (01)

DEC - 9 2020

No. 4:20-CR-00304-P  
CLERK U.S. DISTRICT COURT

By: \_\_\_\_\_  
Deputy

FACTUAL RESUME

INFORMATION/INDICTMENT: Possess a Controlled Substance with Intent to Distribute, In violation of 21 U.S.C. § 841(a)(1) and (b)(1)(C).

MAXIMUM PENALTY:

- Imprisonment for a period not more than 20 years;
- A fine not to exceed \$1,000,000 or both a fine and imprisonment;
- A supervised-release term of not less than 3 years. If the defendant violates any of the supervised-release conditions, the Court may revoke such term of supervised release and require the defendant to serve an additional period of confinement;
- A \$100 mandatory special assessment;
- Restitution to victims or to the community; and
- Forfeiture of property.

ELEMENTS OF THE OFFENSE:

The essential elements which must be proved beyond a reasonable doubt in order to establish the offense charged in the Information/Indictment are as follows:

- First: The defendant knowingly possessed a controlled substance;
- Second: The substance was in fact methamphetamine; and
- Third: The defendant possessed the substance with the intent to distribute it.

STIPULATED FACTS:

On or about October 6, 2020, in the Fort Worth Division of the Northern District of Texas, defendant **Mary Jane McIntyre** did knowingly and intentionally possess with intent to distribute a mixture and substance containing a detectable amount of methamphetamine, a Schedule II controlled substance.

On or about October 6, 2020, Postal Inspectors and Special Agents with the U.S. Postal Service Office of Inspector General (USPS-OIG) executed a federal search warrant at **McIntyre's** residence on Savannah Club Drive in Arlington, Tarrant County, Texas in connection with an investigation of **McIntyre** and other individuals for distributing narcotics using the U.S. mails. During the execution of the search warrant, Postal Inspectors recovered several vacuum-sealed bags containing bulk quantities of methamphetamine. Along with the methamphetamine, agents recovered quantities of small vacuum-sealed packages marked with 3.5 and 7 in red marker on the exterior of the bag, this is consistent with other narcotics packages recovered during the investigation. Also found in the residence were USPS shipping supplies including Priority Mail envelopes, Priority Mail Small Flat Rate boxes, manila envelopes, suspected marijuana, blank DVD cases, and rolls of vacuum seal bags. Postal Inspectors also recovered envelopes with approximately \$23,000 or more in U.S. currency hid behind several pictures on the walls of the apartment. On prior occasions, **McIntyre** has been captured on Post Office surveillance cameras mailing parcels for her son, who is a known narcotics distributor.

SIGNED this 24<sup>TH</sup> day of NOVEMBER, 2020.

  
MARY JANE MCINTYRE  
Defendant

  
ANTHONY GREEN  
Counsel for Defendant